

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT CHATTANOOGA**

PI, INC.,)	
)	
Plaintiff,)	
v.)	
)	Case No. 1:12-cv-350
M. MELANIE BEENE, JONES C. BEENE,)	
IV AND F. ALLISON BEENE,)	Judge Harry S. Mattice, Jr.
)	
Defendants and Third-Party)	Magistrate Judge Susan K. Lee
Plaintiffs,)	
)	
v.)	
)	
JAMES JEFFERSON BEENE, II AND)	
JONES C. BEENE,)	
)	
Third-Party Defendants.)	

**AMENDED RESPONSE OF PI, INC., JAMES JEFFERSON BEENE, II,
AND JONES BEENE TO DEFENDANTS' MOTION [52] TO FILE
DOCUMENTS UNDER SEAL**

Comes now PI, Inc. James Jefferson Beene, II, and Jones Beene (hereafter
"Responding Parties"), pursuant to the Court's Order [Doc. 76], and file this Amended
Response to Defendants' Motion to file Documents under Seal [Doc. 52].

Responding Parties Agree to the Motion and Request that it be granted. For Cause
Responding Parties would Show:

1. General Response. PI is a privately owned, and not-publically traded
corporation. PI is in a competitive industry. The details and secrets of its inner-workings

and financial position are not made public. PI takes vigilant measures to keep its business and financial capabilities and affairs private. PI's business and financial affairs are not available to the public.

1. Proposed Exhibit H to Defendants' Memorandum [Doc. 51] is the deposition of Jeremy Fairbanks [51-8]. Mr. Fairbanks is PI's Information Technology (IT) Manager. The portions of the deposition filed reveal the interworkings of PI's information technology capabilities. Having a competitor glean insight into (1) PI's technological capabilities and (2) PI's limitations would be damaging to PI.

2. Proposed Exhibit I to Defendants' Memorandum [Doc. 51] are recent PI financial statements [51-9]. As set forth in the General Response above, PI's financial statements are private and not made public. These financial statements detail PI's relative financial strengths and weaknesses. It would be damaging for PI's business for these financial statements to be made public.

WHEREFORE, for cause shown, Responding Parties request that the motion to file documents under seal [Doc. 52] be granted.

Submitted this _14th day of March, 2014.

/s/ Brian C. Quist

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CERTIFICATE OF SERVICE

I hereby certify that on this the **14th day of March 2014**, a copy of the foregoing Document was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system.

/s/ Brian C. Quist

Brian C. Quist (BPR #012762)

